

Rory T. Kay, Esq. (NSBN 12416)
Tara U. Teegarden, Esq. (NSBN 15344)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
rkay@mcdonaldcarano.com
tteegarden@mcdonaldcarano.com

*Attorneys for Defendant
Early Warning Services, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

AMANDA DOYLE,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC;
EARLY WARNING SERVICES, LLC;
WELLS FARGO BANK, N.A.; U.S. BANK,
N.A.; and NEVADA CREDICO, INC. DBA
QUANTUM COLLECTIONS;

Defendants.

Case No. 2:21-cv-02081

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANT EARLY WARNING
SERVICES, LLC TO RESPOND TO
COMPLAINT**

(First Request)

Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Amanda Doyle (“Plaintiff”), by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time for Defendant Early Warning Services, LLC to Respond to Complaint, up to an including January 18, 2022. In support of the Stipulation, the parties state the following:

1. EWS was served with the Complaint on November 30, 2021.
2. EWS’s responsive pleading is currently due December 21, 2021.
3. The undersigned counsel for EWS was retained by EWS in connection with this matter and is continuing to review the allegations asserted in the Complaint.
4. Counsel for Plaintiff has agreed to the requested extension and the requested extension will not impact any other deadlines in this case.
5. This is the first request to extend the deadline for EWS to file its responsive pleading.
6. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

7. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive pleading shall be extended through January 21, 2022.

DATED: December 21, 2021

KIND LAW

McDONALD CARANO LLP

By: /s/ Michael Kind

Michael Kind, Esq. (NSBN 13903)
8860 S. Maryland Pkwy., Suite 106
Las Vegas, Nevada 89123
mk@kindlaw.com

George Haines, Esq. (NSBN 9411)
Gerardo Avalos, Esq. (NSBN 15171)
FREEDOM LAW FIRM
8985 S. Eastern Ave., Suite 350
Las Vegas, Nevada 89123
Ghaines@freedomlegalteam.com

*Attorneys for Plaintiff
Amanda Doyle*

By: /s/ Rory T. Kay

Rory T. Kay, Esq. (NSBN 12416)
Tara U. Teegarden, Esq. (NSBN 15344)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
rkay@mcdonaldcarano.com
tteegarden@mcdonaldcarano.com

*Attorneys for Defendant
Early Warning Services, LLC*

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: December 21, 2021